

James L. Robert
HONORABLE ROBERT S. LASNIK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

0912139 B.C. LTD., a Canadian
corporation, and PAKAGE APPAREL
INC., a Canadian corporation,

Plaintiffs,

vs.

RAMPION USA INC. a Washington
corporation, and RAMPION
ENTERPRISES LTD., a Canadian
corporation

Defendants.

CIVIL ACTION NO. 2:18-cv-1464-RSL

**STIPULATION AND PROPOSED
ORDER TO EXTEND CASE
DEADLINES**

Pursuant to LCR 7(d)(1), Plaintiffs 0912139 B.C. Ltd. and Pakage Apparel Inc. ("Plaintiffs") and Defendants Rampion USA Inc. ("Rampion USA") and Rampion Enterprises Ltd. ("Rampion Enterprises") (collectively, "Defendants"), through their respective undersigned counsel, hereby stipulate to extend the time for Rampion USA to answer or otherwise respond to Plaintiffs' complaint. The extension would move the deadline for responding to the complaint to November 14, 2018.

Plaintiffs and Defendants stipulate that Rampion Enterprises will accept service of the summons and complaint in this matter and the parties further stipulate that Rampion Enterprises' deadline to answer or otherwise respond to Plaintiffs' complaint is December 21, 2018.

STIPULATION AND PROPOSED ORDER TO
EXTEND CASE DEADLINES - 1
2:18-cv-1464-RSL

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1 Plaintiffs and Plaintiffs' counsel further agree and acknowledge that, other than the defense
2 of insufficient service, this stipulation does not constitute a waiver of any defense of Defendants,
3 including but not limited to the defense of lack of personal jurisdiction or improper venue.

4 The parties respectfully submit that there is good cause for this stipulated motion. The
5 extension of time is reasonable under the circumstances, as the complaint was filed on October 5,
6 2018 and prior to the parties' agreement, as reflected in this stipulation, Plaintiffs had not yet
7 effectuated service on the Canadian defendant, Rampion Enterprises. As no other case deadlines
8 have been set, the extension will not interfere with any other case deadlines, and no other deadlines
9 need to change.

10 Accordingly, the parties respectfully request that the Court extend the deadlines for
11 Defendants to answer or otherwise respond to the complaint, as set forth in this stipulation.

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13 **IT IS SO ORDERED** this 2nd day of ^{November}~~October~~, 2018. *Just*

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15 HONORABLE ~~ROBERT S. LASNIK~~ *James L. Robart*
16 UNITED STATES DISTRICT JUDGE *Just*

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19 DATED this 30th day of October, 2018

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